



BellSouth Telecommunications, Inc.
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REC'D TN
REGULATORY AUTH.

SEP 20 PM 4 11

OFFICE OF THE
EXECUTIVE SECRETARY

September 20, 2000

Guy M. Hicks
General Counsel

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VIA HAND DELIVERY

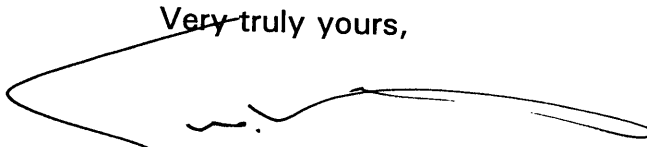
Mr. David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243

Re: *Tariff Filing of BellSouth Telecommunications, Inc. to Reduce
Grouping Rates in Rate Group 5 and to Implement a 3% Late Payment
Charge*
Docket No. 00-00041

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s Opposition to Consumer Advocate Division's Motion for Extension of Time to Argue Before the TRA. Copies of the enclosed are being provided to counsel of record.

Very truly yours,



Guy M. Hicks

GMH/jem

Enclosure

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

REC'D TN
REGULATORY AUTH.

*00 SEP 20 PM 4 11

In Re: *BellSouth Telecommunications, Inc.'s Tariff Filing to Reduce Grouping Rates in Rate Group 5 and to Implement a 3% Late Charge*

Docket No. 00-00041

BELLSOUTH TELECOMMUNICATIONS, INC.'s OPPOSITION
TO CONSUMER ADVOCATE DIVISION'S
MOTION FOR EXTENSION OF TIME TO ARGUE BEFORE THE TRA

BellSouth Telecommunications, Inc. ("BellSouth") respectfully submits this Opposition to the "Motion for Extension of Time to Argue Before the TRA" which was filed by the Consumer Advocate Division ("CAD") earlier today.

I. THE TRA SHOULD DECIDE THE MATTERS ON THE SEPTEMBER 26, 2000 CONFERENCE AGENDA WITHOUT ORAL ARGUMENT.

The TRA is not required to hear oral argument on every document the CAD files, see Rule 1220-1-2-.06(4), and in this instance, the TRA should decide the matters before it without hearing yet another round of argument by the parties. As the CAD's Motion correctly states, "this matter has appeared on several previous Conference Agendas" Motion at 1. This matter also has been addressed in numerous pleadings, briefs, and prior arguments. Moreover, BellSouth's tariff providing for late payment charge and hunting rate reductions has been approved by the Directors and is scheduled for implementation in October. In light of these facts, BellSouth respectfully submits that there is no reason for the Directors to hear yet another round of oral argument in this matter. Instead, the Directors

should simply rule on the pending matters on the basis of these pleadings, briefs, and prior arguments.

II. THE CAD SHOULD NOT BE ALLOWED TO FILE YET ANOTHER BRIEF IN THIS DOCKET.

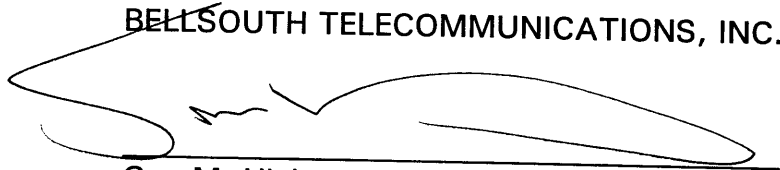
The CAD's Motion states that "Mr. Williams has told Mr. Broemel that he intends to file another brief in response to BellSouth's latest filing" Motion at 1 (emphasis added). BellSouth's "latest filing," however, responds to an objection and Motion filed by the CAD and to an untimely legal brief the CAD improperly filed under the guise of an affidavit. Accordingly, there have been filings by the CAD and a response by BellSouth. No further briefs are necessary or warranted. *Cf.* Rule 1220-1-2-.06(3) ("No reply to a response shall be filed except upon leave given or upon the order of the Authority or Hearing Officer.").

Moreover, since the TRA approved BellSouth's tariff, the CAD has filed at least 10 documents in this docket.¹ These documents are replete with the CAD's legal argument regarding BellSouth's tariff. The CAD, therefore, has fully presented its legal arguments in this docket, and the TRA should not delay rendering its decision on reconsideration.

¹ See Petition for Stay of Effectiveness; Notice of Filing and Incorporation; Second Petition for Stay of Effectiveness and Petition for Reconsideration; Notice of Filing; Reply to BellSouth's Response to Tennessee Consumers's Second Petition for Stay of Effectiveness and Petition for Reconsideration; Statement regarding filings in docket; Reply to BellSouth's Response to Tennessee Consumers's Petition for Reconsideration; Objection to 9/1/00 Notice of Filing of Executive Secretary and to the Appearance of Violations of the Public Meetings Act; Motion to Amend Tennessee Consumers' Petition to Intervene; and Response to BellSouth's Implied Motion for Summary Judgment.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

A handwritten signature in black ink, appearing to read "Guy M. Hicks", is written over a horizontal line.

Guy M. Hicks

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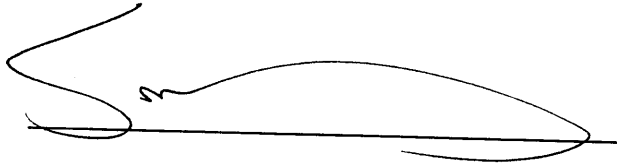
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CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☐ Hand
- ☒ Mail
- ☒ Facsimile
- ☐ Overnight

L. Vincent Williams, Esquire
Office of Tennessee Attorney General
425 Fifth Avenue North
Nashville, Tennessee 37243

A handwritten signature in black ink, appearing to read "L. Vincent Williams", is written over a horizontal line.